



February 11, 2010

Filed Via ECFS

Ms. Marlene H. Dortch, FCC Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

RE: Conversant Technologies, Inc. – 2009 Annual CPNI Certification Filing
EB Docket No. 06-36

Dear Ms. Dortch:

Enclosed for filing please find the Annual CPNI Compliance Certification for calendar year 2009 submitted on behalf of Conversant Technologies, Inc., as required by section 64.2009(e) of the Commission's rules.

Any questions you may have concerning this filing may be directed to me at 407-740-3004 or via email to rnorton@tminc.com.

Sincerely,

Robin Norton
Consultant to Conversant Technologies, Inc.

RN/lm

cc: Best Copy and Printing, Inc. - FCC@BCPIWEB.COM
cc: Lynda Gaston - Conversant
file: CTI - FCC
tms: FCCx1001

EB Docket 06-36

Date _____

Attachment A
Statement of CPNI Procedures and Compliance

**Statement of CPNI Procedures and Compliance
For 2009
Conversant Technologies, Inc.**

Conversant Technologies, Inc. operates solely as an inmate service provider and as such provides only operator assisted call completion services for transient end users. Therefore, all of our services consist of casual traffic provided outside of any subscribed service relationship. We do not have any information that relates to the quantity, technical configuration, type, or location of the customer's presubscribed services. Because the service is provided outside of any presubscribed service relationship, we do not obtain any CPNI that can be used for marketing purposes. Calls are either billed by the local exchange carrier service the customer or provided on a prepaid basis only.

Our marketing efforts are directed only towards correctional facilities, and such efforts do not include the use of CPNI. Should we expand our business in the future to include the provision of services that involve CPNI, we will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

We have processes in place to safeguard call detail information from improper use or disclosure by employees, and to discover and protect against attempts by third parties to gain unauthorized access to call detail. Specifically, all customer service department employees must sign a statement confirming that they understand that any improper use of a customer's call detail or prepaid account information, or disclosure of such to a third party will result in immediate termination, and that any illegal activity will be reported to the appropriate authorities. We conduct thorough background checks on each customer service representative prior to hire; we do not hire any individual that has any criminal history.

We do not provide call detail or prepaid account information to any third party except for law enforcement agencies, and then only upon receipt of a subpoena. Call detail is always required to be made available to correctional facility management personnel, who control their own access to it.

We do provide on-line access to CPNI but this information is specific to the account holders and requires a pre-established, unique user ID and password. We do not provide call detail information over the telephone. All customer service personnel are trained not to discuss call detail information unless the caller provides date and time of the call and we can verify it against our records. The called party's local phone company bills collect calls and has its own controls for disclosure and access to this information.

For called parties who establish a prepaid account, we assign an internal ID Code within our database. This ID Code is provided to the customer at the time the account is established. Customers calling into our customer service department about their accounts must first provide a password which is the answer to a specific "shared secret" question that does not involve the use of readily available biographical or account information, before any inquiries are addressed. If a customer has forgotten their password, we then request the customer to verify the ID code issued on the account that is only given out at the time of set up. If a customer fails to answer the correct password and ID code on the account, we then ask the customer to provide the name and address on the account. Upon verification, we mail a NEW password confirmation to the address verified and listed on the account.

Any requested change to prepaid account information would be handled over the phone on an inbound calling basis. No change is made unless all passwords, ID Code, and current account information are first verified. Once a change has been made, a letter is sent to the original address on file without providing the new information. The letter requests the customer to call if they have not contacted CTI to have any information changed.

As an inmate services provider, we do not have any retail locations and therefore do not disclose CPNI in-store.

We have procedures in place to notify law enforcement in the event of a breach of the call detail records. We have not had any such breaches during 2009, but we have a process in place to maintain records of any breaches discovered and notifications made to the USSS and the FBI.

We have not taken any actions against data brokers in the last year.

We did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2009.

Due to the nature of the inmate calling services business, the call detail we have is not tied to any presubscribed customers. Accordingly, we have not developed any information with respect to the processes pretexters may use to attempt to access CPNI.